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Attorneys for Plaintiff Golden Temple of Oregon, LLC

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

**GOLDEN TEMPLE OF OREGON, LLC,**

No. 09-CV-902-KI

Plaintiff,

v.

Golden Temple of Oregon, LLC's  
**MOTION TO COMPEL**

**WAI LANA PRODUCTIONS, LLC,**

Pursuant to Fed. R. Civ. P. 37

Defendant.

**REQUEST FOR ORAL ARGUMENT**

**WAI LANA PRODUCTIONS, LLC,**  
a California limited liability company,

Counterclaim/Interpleader-Plaintiff,

v.

**GOLDEN TEMPLE OF OREGON, LLC,**  
an Oregon limited liability company,

Counterclaim/Interpleader-Defendant,

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**BIBIJI INDERJIT KAUR PURI,** an  
individual,

Counter-Claim Plaintiff,

v.

**WAI LANA PRODUCTIONS, LLC,** a  
California limited liability company,

Counter-Claim Defendant,

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**BIBIJI INDERJIT KAUR PURI,** an  
individual,

Cross-Claim Plaintiff,

v.

**GOLDEN TEMPLE OF OREGON, LLC,** an  
Oregon limited liability company,

Cross-Claim Defendant.

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### **RULE 7.1 CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1, counsel for plaintiff Golden Temple of Oregon, LLC (“Golden Temple”), hereby certifies that she conferred in good faith with counsel for defendant Wai Lana Productions, LLC (“Wai Lana”) to resolve the issues raised in this Motion to Compel and that the parties have been unable to reach an agreement.

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## **MOTION**

Pursuant to Fed. R. Civ. P. 37, Plaintiff Golden Temple moves this Court for an Order:

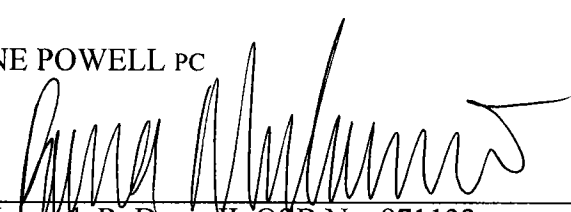
- (1) Compelling Defendant to produce documents in response to Plaintiff's Requests for Production of Documents pursuant to the Federal Rules of Civil Procedure;
- (2) Compelling Defendant to confirm if any additional documents exist responsive to certain requests; and
- (2) Awarding Plaintiff its attorneys' fees and costs incurred in bringing this Motion to Compel.

This Motion to Compel is supported by the Memorandum, the Declaration of Kenneth R. Davis II, and the Declaration of Parna A. Mehrbani submitted concurrently herewith.

DATED: September 29, 2010

LANE POWELL PC

By

  
Kenneth R. Davis II, OSB No. 971132

Parna A. Mehrbani, OSB No. 053235

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